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April 1, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk / Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Public Service Commission Review of South Carolina Code of Regulations
Chapter 103 Pursuant to S.C. Code Ann. Section 1-23-120(J)

Docket No. 2020-247-A

**LETTER FROM BLUE GRANITE WATER COMPANY REGARDING
MINIMUM FILING REQUIREMENTS FOR RATE CASE APPLICATIONS**

Dear Ms. Boyd:

I am filing this letter on behalf of Blue Granite Water Company (the "Company") pursuant to the Notice of Review filed in the above-referenced docket as related to S.C. Code Ann. Regs. 103-823 of the Commission's regulations and the consideration of Minimum Filing Requirements ("MFRs"). The comments below are in response to those filed by various parties as of March 26, 2021. The Company appreciates this opportunity to provide input in this process and intends to participate in the workshop scheduled for April 5, 2021.

The Company has reviewed the comments filed to-date and agrees with several points that have been presented. The Company agrees with SouthWest that consideration of MFRs for water and wastewater utilities should be discussed separately from the electric and gas utilities due to materially different proposed requirements, formats, and other relevant factors. The Company further agrees with the comment of SouthWest and Duke Energy Carolinas, LLC and Duke Energy Progress, LLC that, because the Commission already requires extensive information be filed with a rate application, the Commission's and parties' efforts in the current docket should first be focused on identifying any specific gaps within the current requirements, and only then attempt to fill those gaps by considering the practices of similar jurisdictions.

As related to these issues, the Company would also recommend considering the practices of nearby jurisdictions such as North Carolina, which operates within a similar regulatory and ratemaking model and presents synergistic opportunities for utilities that operate in both states. Additionally, to the extent the Commission is



leveraging practices of other jurisdictions, it would be helpful to obtain information from the other jurisdictions' representatives, for example, 1) whether and to what extent the regulator or intervenors actually use the information provided in the MFRs, 2) whether and to what extent the MFRs regularly add anything to the evidence in the record, and 3) whether and to what extent the MFRs are actually relied upon in testimony or hearings. It would also be helpful to better understand the confidentiality practices associated with the information provided in the other jurisdictions.

The Company also agrees with SouthWest and Dominion that the proposed MFRs would add to the complexity and bulk of rate applications without demonstrated commensurate benefits. The time and cost of meeting new requirements will be extensive and will divert resources from preparing and presenting the substantive case of the utility as needed to support its requests. Each utility's rate filings already tend to have consistent formats and schedule structures, only updating these as needed to accommodate the unique circumstances of each request (e.g., consolidation efforts, new initiatives or programs, or operational changes). It is telling that the Consumer Advocate has recommended that more information be provided in rate applications, but has not recommended any particular set of MFRs. This leaves unclear what specific gaps are being filled by MFRs that make them necessary to better understand a utility's request.

The Company reiterates its understanding that a rulemaking would be required to impose the MFRs on utilities. The Company therefore provides these comments on a preliminary basis and reserves its right to provide additional input at a later date consistent with the S.C. Administrative Procedures Act, S.C. Code Ann. § 1-23-10, *et seq.*

Thank you for your consideration of these comments.

Kind regards,

Sam Wellborn

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c: Jeffrey M. Nelson, Chief Legal Officer, ORS (via email)
Donald Denton, President (via email)
Phil Drennan, Regional Director of FP&A (via email)